

## **EXHIBIT 1**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION**

Santana Bryson and Joshua Bryson,	)	
as Administrators of the Estate of	)	
C.Z.B., and as surviving parents of	)	
C.Z.B., a deceased minor,	)	Case No. 2:22-CV-017-RWS
	)	
Plaintiffs,	)	JURY TRIAL DEMANDED
	)	
v.	)	
	)	
Rough Country, LLC,	)	
	)	
Defendant.	)	

**DEFENDANT ROUGH COUNTRY’S SUPPLEMENT  
TO ITS INITIAL DISCLOSURES**

Pursuant to the Federal Rules of Civil Procedure and the Local Rules of the Northern District of Georgia, Defendant supplements its initial disclosures as follows:

**(6) Provide the name of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. For all experts described in Fed.R.Civ.P. 26(a)(2)(B), provide a separate written report satisfying the provisions of that rule. (Attach expert witness list and written reports to Initial Disclosures as Attachment B.)**

**Response:** Defendant has not decided whether to call such expert witnesses, but will supplement this response and provide reports as required by Federal Rules of Civil Procedure and the Local Rules for the USDC for the Northern District of Georgia.

**Supplemental Response:** See Defendant's expert list attached hereto as Supplemental Response Attachment B, and the other information that has been made known during the discovery process or in writing.

Dated this 29th day of March, 2024.

WEINBERG, WHEELER, HUDGINS,  
GUNN & DIAL, LLC

/s/ Richard H. Hill, II

Richard H. Hill, II  
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**CERTIFICATE OF SERVICE**

This is to certify that I have electronically served the foregoing document on the following attorneys:

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***ATTORNEYS FOR PLAINTIFFS***

This 29th day of March, 2024.

WEINBERG, WHEELER,  
HUDGINS, GUNN & DIAL, LLC

*/s/ Richard H. Hill, II*

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Richard H. Hill, II  
Georgia Bar No. 354425

**DEFENDANT'S SUPPLEMENTAL  
ATTACHMENT B: EXPERT LIST**

**(6) Provide the name of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. For all experts described in Fed.R.Civ.P. 26(a)(2)(B), provide a separate written report satisfying the provisions of that rule.**

Defendant provides the following list of experts it may call at trial:

**Wesley B. Grimes, P.E.  
Mecanica Scientific Services  
2812 North Norwalk, Suite 123  
Mesa, Arizona 85215**

Mr. Grimes is a professional engineer and expert in the fields of transportation crash analysis and reconstruction engineering, vehicle performance testing and analysis, and vehicle dynamics. He is also an expert in computer simulation models, specifically the Human Vehicle Environment (HVE) computer simulation software. Mr. Grimes is expected to testify as to the accident reconstruction of the collision in this case, including his inspection and documentation of the crash site, the vehicles involved in the subject crash, and an analysis of the crash. Mr. Grimes is expected to testify as to the forces and interactions of the vehicles and the dynamics of the vehicle crash, including the deformation, accelerations, delta-Vs, and rear seat deformation in the Escape. Mr. Grimes will also testify as to the exemplar vehicle crash test that was performed by Exponent, involving an exemplar F-250 in the original OEM configuration. Mr.

Grimes will explain that the exemplar vehicle crash test showed substantially similar deformation, accelerations, delta Vs, and Escape rear seat deformation as the subject crash, and therefore the deformation and accelerations of the Ford Escape would have been substantially similar whether the F-250 was lifted or was equipped with a stock suspension. Mr. Grimes will also testify regarding his analysis of the HVE simulation performed by Mr. Buchner.

Mr. Grimes bases his testimony on his inspection of the accident scene, his inspection of the subject vehicles and car seat, his inspection of an exemplar lift kit, the downloads of electronic data from both vehicles, witness statements, police reports and investigation files, the exemplar crash testing performed in connection with this case, the depositions taken in this case, the documents produced in this case, and his education, training and experience.

As additional information becomes available in this case, Mr. Grimes will review that information and update his opinions if necessary. Mr. Grimes will provide his file within seven days prior to his deposition. Defendants refer Plaintiff to Mr. Grimes' Expert Report, which contains a more detailed explanation of his opinions and how he arrived at them, and includes his CV, Testimony List, and Fee Schedule.

**Lisa P. Gwin, DO, BSEE, BSN**  
**Biodynamic Research Corporation**  
**12810 West Golden Lane**  
**San Antonio, Texas 78249**

Dr. Gwin is an expert in the fields of biomechanics, injury causation, occupant kinematics, motor vehicle collisions, automotive engineering, accident reconstruction, and general medicine. Dr. Gwin is expected to testify about the biomechanics and occupant kinematics in the subject accident and in the exemplar vehicle crash testing performed by Exponent. Dr. Gwin will opine about the biomechanics of the occupants inside the Escape at the time of the incident, the cause of injury and death to CZB, and the forces experienced by CZB in the subject crash. Dr. Gwin is also expected to testify regarding the same subjects in relation to the vehicle crash testing performed at Exponent, including all aspects of the exemplar crash testing and the results and conclusions related to that crash testing. Dr. Gwin is expected to testify that, based upon the exemplar crash testing and her analysis of the subject incident, if the Ford F-250 had been equipped with a stock suspension there would still have been intrusion of the rear structures and deformation of the second row seat, more likely than not leading to the same outcome for CZB.

Dr. Gwin's testimony is based upon her inspection of the subject vehicles; her inspection of the child seat; the crash reconstructions and simulations; the exemplar vehicle crash testing; her review of documents produced in discovery as outlined in detail in her attached report; her review of depositions taken in this case, her review of police reports and investigations; her review of photographs of

the vehicles and of the scene; the opinions of other experts in this case; her review of medical records; her education, training, and experience; scientific and other literature, as outlined in her attached report; and methods generally accepted in the field of biomechanics and automotive engineering. Dr. Gwin will provide her file seven days prior to her deposition. Defendants also refer to Dr. Gwin's report, which contains a more detailed explanation of her opinions and how she arrived at them, the description of her background and qualifications in her CV, her testimony list, and her rate schedule and billing practice.

**Charles Crosby, PE**  
**Senior Managing Engineer, Vehicle Practice**  
**Exponent**  
**23445 North 19<sup>th</sup> Avenue**  
**Phoenix, AZ 85027**

Mr. Crosby is a professional engineer and expert in the fields of accident reconstruction and vehicle crash analysis. Mr. Crosby is an expert in the evaluation of vehicle simulation and accident reconstruction computer software. Mr. Crosby has experience with full scale crash testing and vehicle component assessments including failure testing and crush evaluations.

Mr. Crosby is expected to testify regarding the exemplar vehicle crash test that he performed on May 15, 2023, involving an exemplar 2016 Ford F-250 pickup and a 2008 Ford Escape. He is expected to testify as to the parameters, measurements, and results of the crash, as documented in his extensive Crash Report attached hereto. Mr. Crosby will also testify as to the specific details of the vehicles involved in the exemplar crash testing, the details regarding the



procedure and parameters for the test, his recording of the test, and his photographs and recording of the exemplar vehicles following the test.

Mr. Crosby bases his testimony on his review of materials related to the vehicles involved in the subject crash and the exemplar crash test; the crash test itself, the details of which are included in the attached crash report; vehicle specifications; documents produced in this case; and his education, experience, knowledge and training.

As additional information becomes available in this case, Mr. Crosby will review that information and update his opinions if necessary. Mr. Crosby will provide his file seven days prior to his deposition. Defendants refer Plaintiffs to Mr. Crosby's Crash Report, which contains a more detailed explanation of his opinions and how he arrived at them. Defendants also refer Plaintiffs to Mr. Crosby's CV containing the description of his background and qualifications; his testimony list; and a statement of his compensation contained within the attached report.

**Robert J. Pascarella**  
**Tandy Engineering & Associates, Inc.**  
**32430 Dobbin Huffsmith Road**  
**Magnolia, Texas 77354**

Mr. Pascarella is an expert in the fields of motor vehicle accident reconstruction and crash investigation, automotive engineering, vehicle design, development, analysis, testing, and evaluation, and vehicle dynamics testing and computer aided engineering. Mr. Pascarella is expected to testify regarding Ford's

knowledge and experience with its independent dealers regarding after-market lift kits and the Ford F-250's Owner's Manual with regard to the warnings contained therein. More specifically, Mr. Pascarella is expected to testify that the warnings contained in the subject F-250's Owner's Manual regarding the installation of aftermarket modifications, including lift kits, do not constitute a blanket restriction of all aftermarket modifications, and do not in any way relate to any risk of vehicle-to-vehicle compatibility and/or override or intrusion.

Mr. Pascarella's testimony is based upon his review of the Ford F-250's Owner's Manual, service records from Ronnie Thompson Ford for the subject F-250; police reports; depositions taken in this case; discovery responses and document production by Rough Country in this case; the opinions of other experts in this case; his education, training, knowledge and experience and methods generally accepted in the fields of accident reconstruction, automotive safety, and automotive design.

As additional information becomes available in this case, Mr. Pascarella will review that information and update his opinions if necessary. Mr. Pascarella will provide his file seven days prior to his deposition. Defendant refer Plaintiffs Mr. Pascarella's expert report, which contains more detailed explanations of his opinions, the description of his background and qualifications in his CV, testimony list, and statement of compensation.